Message

From: Osborne, Russell [Russell.Osborne@dnr.mo.gov]

Sent: 7/8/2020 4:37:43 PM

To: Hanlon, Lisa [Hanlon.Lisa@epa.gov]

CC: Queiroz, Gustavo [queiroz.gustavo@epa.gov]

Subject: RE: OSWI Rule Questions

Hi Lisa,

I was curious if you had found out anymore guidance pertaining to the portable air curtain incinerator?

Thank you for your time, Russell

From: Hanlon, Lisa < Hanlon.Lisa@epa.gov> Sent: Tuesday, June 23, 2020 2:46 PM

To: Osborne, Russell < Russell.Osborne@dnr.mo.gov> **Cc:** Queiroz, Gustavo < queiroz.gustavo@epa.gov>

Subject: RE: OSWI Rule Questions

Hi Russell:

At first glance, this looks like a CISWI unit to me. Unless it's owned by a municipality or other governmental entity, in which it would be an OSWI unit. I'm double checking with HQ who may have some more insight into this type of combustion just in case I'm missing something. Lisa

Lisa Hanlon
Air Compliance
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
913-551-7599
hanlon.lisa@epa.gov

From: Osborne, Russell < Russell. Osborne@dnr.mo.gov >

Sent: Monday, June 22, 2020 6:13 PM **To:** Hanlon, Lisa < <u>Hanlon, Lisa@epa.gov</u>> **Subject:** RE: OSWI Rule Questions

Hi Lisa,

I believe you have previously helped me with a tire pyrolysis question. I hope all is well.

I am now working on a project where the installation is using a ROI Carbonator 500, I have attached a flyer about the equipment for clarity purposes. The proposed process will use 100% clean Missouri hardwood obtained from the installation harvesting themselves as well as receiving materials from local tree service companies. The equipment is to operate at 2500 degrees Fahrenheit. The manufactures claim, at this temperature, although air is forced into the equipment the combustion process is still starved for air. This allows roughly 5% of the feed to undergo pyrolysis. The

recovered char will be sold as soil supplement. The installation is proposing to be portable with sites located in Liberty, Springfield, and O' Fallon, Missouri.

I have read through the OSWI rules and understand that ACI's are regulated in §60.2970 - §60.2974. It is my understanding however there may be some guidance out there stating that this process is not considered an ACI. I am unsure as to how to classify the equipment. I have read the definitions in Subpart E and Subpart CCCC and just want to be sure of myself as this is a unique process.

Thank you for your time, Russell Osborne

From: Hanlon, Lisa < Hanlon.Lisa@epa.gov > Sent: Monday, June 22, 2020 7:41 AM

To: Cheever, Robert < cheever.robert@epa.gov >; Osborne, Russell < Russell.Osborne@dnr.mo.gov >

Subject: RE: OSWI Rule Questions

Except that's a typo. My number is 7599, but it's often easier to put it in an email so I get the details straight and can respond without having to ask for more info.

Lisa H

Lisa Hanlon
Air Compliance
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
913-551-7599
hanlon.lisa@epa.gov

From: Cheever, Robert < cheever.robert@epa.gov>

Sent: Monday, June 22, 2020 5:43 AM

To: Osborne, Russell < Russell.Osborne@dnr.mo.gov>

Cc: Hanlon, Lisa < Hanlon, Lisa@epa.gov>
Subject: RE: OSWI Rule Questions

Russell,

Lisa Hanlon at 913-551-7968 or hanlon.lisa@epa.gov is the Region 7 OSWI point of contact.

Bob Cheever

From: Osborne, Russell < Russell.Osborne@dnr.mo.gov>

Sent: Friday, June 19, 2020 3:13 PM

To: Cheever, Robert <cheever.robert@epa.gov>

Subject: OSWI Rule Questions

Hello Mr. Cheever,

My name is Russell Osborne I work for the MDNR Air Pollution Control Program. I had some guidance questions for a project and Kendall told me you could point me in the right direction. I was wanting some clarity on the OSWI rules. Who is the EPA Region 7 contact for OSWI rule questions?

Thank you for your time,

Russell Osborne, E.I.T.

Missouri Department of Natural Re

Missouri Department of Natural Resources Air Pollution Control Program P.O. Box 176 Jefferson City, MO 65102

Phone: 573-526-1545